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Attorney for Defendants City of Surprise, Skip Hall and Steven Shernicoff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Rebekah Massie,

No. 2:24-cv-02276-ROS--DMF

Plaintiff,

v.

City of Surprise, a municipal corporation
and a governmental entity; Skip Hall, in his
individual capacity; and Steven Shernicoff,
in his individual capacity,

Defendants.

**STIPULATED MOTION TO
EXTEND TIME TO RESPOND TO
DEFENDANTS' PARTIAL MOTION
TO DISMISS PLAINTIFF'S SECOND
AMENDED COMPLAINT FOR
CIVIL-RIGHTS VIOLATIONS**

Plaintiff Rebekah Massie and Defendants City of Surprise, a municipal corporation
and a government entity, Skip Hall, in his individual capacity, and Steven Shernicoff, in

his individual capacity, by and through undersigned counsel, hereby file this stipulated motion for a modification of Plaintiff's time to respond to Defendants' Partial Motion to Dismiss Plaintiff's Second Amended Complaint for Civil-Rights Violations (Doc. 34).

Plaintiff filed her Second Amended Complaint on April 22, 2025, and Defendants responded with their Partial Motion to Dismiss on May 27, 2025 (Docs. 32, 34). There are no previous motions concerning the deadline for which this extension is sought.

To allow Plaintiff sufficient time to prepare her response due to counsel's current travel abroad, the parties have conferred and request the Court set the following deadline:

Plaintiff's deadline to respond to Defendants' Partial Motion to Dismiss Plaintiff's Second Amended Complaint for Civil-Rights Violations: **June 24, 2025**.

This Motion is made for good cause, in good faith, and not for the purpose of undue delay. A proposed form of Order is filed alongside this stipulation.

Dated: June 5, 2025

Respectfully submitted,

/s/ Adam B. Steinbaugh

Adam B. Steinbaugh*

(Penn. 326475 / Cal. 304829)

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16 *Hall and Steven Shernicoff*

17 [†] Signed by Adam Steinbaugh with permission.
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CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing document has been served upon the counsel for the parties in interest by operation of the Court's electronic case filing system.

/s/ Adam B. Steinbaugh
Adam B. Steinbaugh